

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION

BLITZSAFE TEXAS, LLC,

Plaintiff,

v.

**VOLKSWAGEN GROUP OF AMERICA,
INC. and VOLKSWAGEN GROUP OF
AMERICA CHATTANOOGA
OPERATIONS, LLC,**

Defendants.

No. 2:15-cv-01278-JRG-RSP

CONSOLIDATED INTO

No. 2:15-cv-01274-JRG-RSP

JURY TRIAL DEMANDED

NOTICE OF CHANGE OF FIRM AND ADDRESS

Please take notice that Michael J. Lennon, Susan A. Smith, Sheila Mortazavi and Michael Turner, counsel for Defendants Volkswagen Group of America, Inc. and Volkswagen Group of America Chattanooga Operations, LLC, have changed their firm affiliation and address for service of notices and other documents in the above-captioned case.

The new firm name and email addresses for Michael J. Lennon, Sheila Mortazavi and Michael Turner are as follows:

ANDREWS KURTH KENYON LLP
One Broadway
New York, New York 10004
Email: michaellennon@andrewskurthkenyon.com
Email: sheilamortazai@andrewskurthkenyon.com
Email: michaelturner@andrewskurthkenyon.com

The new firm name and address for Susan A. Smith is as follows:

ANDREWS KURTH KENYON LLP
1350 I Street, NW, Suite 1100
Washington, DC 20005
Telephone: 202-662-3041

Facsimile: 202-662-2739

Email: susansmith@andrewskurthkenyon.com

All notices and documents addressed to Michael J. Lennon, Susan A. Smith, Sheila Mortazavi and Michael Turner regarding this action should be sent to the above addresses.

Dated: October 21, 2016

Respectfully submitted,

By /s/ Deron R. Dacus

Deron R. Dacus

Texas State Bar No. 00790553

Peter A. Kerr

Texas State Bar No. 24076478

The Dacus Firm, P.C.

821 ESE Loop 323

Suite 430

Tyler, TX 75701

Telephone: (903) 705-1117

Facsimile: (903) 705-1117

Email: ddacus@dacusfirm.com

E-mail: pkerr@dacusfirm.com

Michael J. Lennon

NY State Bar No. 1160506

Sheila Mortazavi (admitted *pro hac vice*)

Michael Turner (admitted *pro hac vice*)

ANDREWS KURTH KENYON LLP

One Broadway

New York, NY 10004-1007

Telephone: (212) 425-7200

Facsimile: (212) 425-5288

Email: michaellennon@andrewskurthkenyon.com

Email: sheilamortazavi@andrewskurthkenyon.com

Email: michaelturner@andrewskurthkenyon.com

Susan A. Smith (admitted *pro hac vice*)

ANDREWS KURTH KENYON LLP

1350 I Street, NW, Suite 1100

Washington, DC 20005

Telephone: (202) 662-3041

Facsimile: (202) 662-2739

Email: susansmith@andrewskurthkenyon.com

Attorneys for Defendants and Counterclaim-
Plaintiffs VOLKSWAGEN GROUP
OF AMERICA, INC. and VOLKSWAGEN GROUP
OF AMERICA CHATTANOOGA OPERATIONS,
LLC

CERTIFICATE OF SERVICE

The undersigned certifies that the foregoing document was filed electronically in compliance with Local Rule CV-5(a). As such, this document was served on all counsel who are deemed to have consented to electronic service. Local Rule CV-5(a)(3)(A). Pursuant to Federal Rule of Civil Procedure 5(d) and Local Rule CV-5(e), all other counsel of record not deemed to have consented to electronic service were served with a true and correct copy of the foregoing by U.S. First Class Mail on this 21st day of October, 2016.

/s/ Deron R. Dacus

Deron R. Dacus